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April 24, 2020

Via ECF

The Honorable Vera M. Scanlon
United States District Court
For the Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, NY 11201

**Re: *Fischler v. Richemont North America, Inc.*, No. 1:20-cv-0980-ENV-VMS
Request to Extend Defendant's Time to Respond to Complaint**

Dear Judge Scanlon:

We represent defendant Richemont North America, Inc. ("Defendant") in the above-referenced action. Pursuant to Rules II(b) and II(b) of Your Honor's Individual Practice Rules, we write with the consent of counsel for plaintiff Brian Fischler ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint from April 27, 2020 to May 27, 2020. This is Defendant's first request for an extension of time to respond to the Complaint.

In support of these requests, counsel for Defendant states that the parties are engaged in discussions about a possible early resolution of this matter. If granted, this extension of time will permit the parties to focus on those discussions, rather than on pleadings and litigation. As noted above, Plaintiff's counsel consents to this request. If granted, this extension will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)

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